



City & County of Denver  
**WELLINGTON E. WEBB**  
 Mayor

70960

**ORIGINAL**

January 19, 2000

DEPT. OF TRANSPORTATION  
 DOCKETS

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Department of Transportation Dockets  
 Docket No. FAA-I 999-6673 - 61  
 400 Seventh Street SW., Room 401  
 Washington, DC 20590

Dear Madam or Sir:

Denver International Airport welcomes the opportunity to respond to the NPRM on Certification of Screening companies. Denver International Airport offers the following comments:

#### SCREENER QUALIFICATIONS – PREAMBLE

1. Denver International Airport continues to recommend credentials for various levels for screeners. Screeners should be individually certified.
2. "FAA is not proposing that training programs be designed in a specific manner, only that they thoroughly and effectively address all of the testing standard subjects."

Denver International Airport disagrees with this statement. At minimum an outline of requirements should be given. The program should be standardized overall. Failure to standardize leaves a big hole and major interpretation from PSI to PSI, therefore no continuity.

3. Set minimum detection requirements to start and increase detection requirements as competency increases.
4. Include section 111.117(a). It will make the testing issue clear cut.

#### REGULATION 111

1. 111.117(b)-Language should be amended to require the screening company to provide any violation notices or warnings to the checkpoint custodian. Allow the custodian to disseminate to all air carriers it has screening agreements with.
2. 111.207 – If an individual has to undergo part 2 (Criminal History Records Check), recommend the individual may be employed as a screener, but not trained on x-ray. Use the individual under supervision at an exit point or other lower security task. This will allow SSI to be held until the individual clears the check. Certain SSI can not be withheld if the individual is allowed to screen. We do not provide SSI to other airport employees that have not been cleared on a Criminal History Records Check. An exception should not be made for screeners.



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**BRUCE BAUMGARTNER**  
 Manager of Aviation

3. 111.209- The SPC should be required to complete some portion of on-the-job training. The perspective and understanding of screener pressures could then be more clearly understood if experienced for this critical task. It is much different with a passenger than in a training room.
4. 111.211-Forty hours of actual experience is not sufficient for an Instructor. A minimum of 180 hours would seem more realistic. If the average time to become a certified screener is approximately 40 hours the statement/regulation as written would allow an individual to become an Instructor after 40 hours of the certification process which usually is when the individual becomes a certified screener. Recommend the FAA look at similar skill level jobs to see what their instructor training requirements are. Also, the document indicates that each instructor would have to be briefed regarding the objectives and standards of each course taught. Who provides the briefing? This should be clearly defined.
5. 111.213(b)-"Eliminating hourly training requirements for initial and recurrent training, in turn, giving flexibility to train screeners using their own FAA approved training programs." Again, this leaves interpretation from PSI to PSI, standardization will not exist.
6. 111.219-Why not certification of screeners versus a "Letter of completion of Training?" Recommend trainer sign "Letter of Completion of Training or Certification" when possible only use GSC,CSS or SIC when trainer not available.
7. 111.205-Implement standards to test the English language requirements; a formal testing process. Airports receive complaints on this issue all the time. Here is an opportunity to correct this continuing program.
8. 111.215(e)-Air carrier employees have to monitor each test that it administers. This may not be feasible at all stations?
9. 108.103-A "description" is vague. Recommend specific criteria in how oversight, evaluations and the testing of screening performance will be accomplished.

The need for a standard program clearly exists. We were unable to obtain a draft of the SSSP because it is not complete. The concept of all screening related requirements consolidated into one document is sound and should be accomplished. We would welcome the opportunity to comment on the SSSP when it becomes available.

Sincerely,



Lori Beckman  
Assistant Deputy Manager  
of Aviation-Security  
Denver International Airport